

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MERRILL ROBERTSON, JR., SHERMAN C.  
VAUGHN, JR., and CAVALIER UNION  
INVESTMENTS, LLC,

Defendants.

Case No. 3:16-cv-667 (JAG)

**CONSENT MOTION TO STAY**

Plaintiff, the Securities and Exchange Commission, by its undersigned counsel, and with the consent of Defendant Robertson, moves the Court for an order staying the summary judgment schedule set forth by the Court in its December 20, 2017 Order, Docket No. 43, and all other deadlines in this case with respect to Defendant Robertson.

Plaintiff and Defendant Robertson have agreed to a proposed settlement that the SEC staff will submit for the review and consideration of the Commission. Defendant Robertson has signed the consent to judgment. However, the SEC staff does not have authority to bind the SEC to this settlement and must submit the recommendation for the review and approval of certain offices and Divisions within the Commission and the Commission itself. The SEC requests the stay to enable the SEC staff to submit the proposed settlement for review.<sup>1</sup> The SEC further requests that the Court order that, on or before March 30, 2018, the SEC shall file the consent

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<sup>1</sup> The SEC anticipates that this process should be completed by March 30, 2018.

and proposed final order or report to the Court why such settlement documents have not been filed.

A proposed Order is attached.

WHEREFORE, the SEC respectfully requests that this Court grant this consent motion to stay.

Respectfully submitted,

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Attorneys for Plaintiff: Plaintiff Securities and  
Exchange Commission

Dated: January 23, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of January, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Allison Baker Shealy  
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I also hereby certify that I have arranged for the foregoing to be mailed this same day by first class mail to:

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/s/  
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